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Large Coating, Printing and Chemical Operations Team	PROCESSED BY	BA
APPLICATION PROCESSING AND CALCULATIONS	REVIEWED BY	
	DATE	1/27/09

**PERMIT TO OPERATE EVALUATION— CHANGE OF CONDITION
for Boilers D-549, D-551 & D-553**

Applicant's Name	THE BOEING COMPANY, C17 PROGRAM
Company I.D.	800038
Mailing Address	3855 LAKEWOOD BLVD., LONG BEACH, CA 90846
Equipment Address	3855 LAKEWOOD BLVD., LONG BEACH, CA 90846

EQUIPMENT DESCRIPTION

APPLICATION NO. 491819 (Admin c/c , Previous A/N 436754, P/O F78973) (D549)

BOILER, CLEAVER BROOKS, MODEL CEW700-400, 150#HW, NAT_GAS FIRED, FIRETUBE TYPE, WITH A 16.3 MMBTU PER HOUR CLEAVER BROOKS LOW NO_x BURNER & FLUE GAS RECIRCULATION.

APPLICATION NO. 491820 (Admin c/c , Previous A/N 436753, P/O F78972) (D551)

BOILER, CLEAVER BROOKS, MODEL CEW700-400, 150#HW, NAT_GAS FIRED, FIRETUBE TYPE, WITH A 16.3 MMBTU PER HOUR CLEAVER BROOKS LOW NO_x BURNER & FLUE GAS RECIRCULATION.

Application No. 491821 (Admin c/c , Previous A/N 436755, P/O F78974) (D553)

BOILER, CLEAVER BROOKS, MODEL CEW700-400, 150#HW, NAT_GAS FIRED, FIRETUBE TYPE, WITH A 33.5 MMBTU PER HOUR CLEAVER BROOKS LOW NO_x BURNER & FLUE GAS RECIRCULATION.

Application No. 491817

RECLAIM AMENDMENT/TITLE V MINOR PERMIT REVISION (TVR – 1st)

HISTORY

The Boeing Co. submitted the above applications for permits to operate for change of permit condition on 3 existing boilers. The applicant is requesting to change the annual source testing requirement of boiler permit Condition (D29-2) under device #s D549, D551 & D553, for CO from

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once a year to once every 3 years to reflect the most recent Rule 1146 amendment. Rule 1146 was amended on September 5, 2008 and for this size boiler, the annual testing for CO & NOx was changed to once every 3 years under subparagraph (d)(6) [(d)(6) & (d)(8) specify compliance determination for NOx, and (d)(9) specifies that the operator can opt to comply with the (monitoring) requirements for CO by (d)(8) or (d)(6).] Since this facility is under the RECLAIM program the applicant is only required to test the boilers for CO emissions under Rule 1146. Testing for NOx emissions as required by Rule 1146 is not applicable for RECLAIM facilities. Boeing conducted source tests for NOx and CO last February 2008 to fulfill the requirement of condition D29-2. The results show compliance with the 400 ppm CO requirement of Rule 1146. There will not be any emission increase due to the proposed change of condition for these boilers.

The Boeing Company manufactures/fabricates military aircraft (C17) at this location. The company operates a number of permitted equipment such as spray booths, spray hangars, ovens, boilers, degreasers, I.C. engines, scrubbers, storage tanks, chemical process lines, afterburner, etc. under the Title V/RECLAIM permit (I. D. # 800038). The District database shows that the applicant has received one complaint for dust which is in process. However, boilers do not create dust. The company did not receive any Notices to Comply or Notices of Violations for the past two years.

This is a Title V/RECLAIM facility. A Title V renewal permit was issued to this facility on January 20, 2008. The proposed project is considered a "minor permit revision" and is the first revision to the Title V renewal permit, as described in the Regulation XXX evaluation.

PROCESS DESCRIPTION

This is a major aircraft manufacturing facility in the basin. Both military and commercial aircraft are manufactured at this location. These boilers provide hot water for plant use.

OPERATING HOURS

Average : 16 hour/day, 6 day/week, 52 weeks/year
Maximum: 16 hour/day, 6 day/week, 52 weeks/year

EMISSION CALCULATIONS

The proposed administrative change of condition to these boiler permits will not result in any changes in emissions, therefore, we will transfer the emission data from each existing boiler permit to the respective new permit.

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RULES/REGULATION EVALUATION

▣ **RULE 212, PUBLIC NOTIFICATION**

▼ **SECTION 212(c)(1):**

This section requires a public notice for all new or modified permit units that may emit air contaminants located within 1,000 feet from the outer boundary of a school. This source is not located within 1,000 feet from the outer boundary of a school and there are no emission increases as a result of this change. Therefore, public notice will not be required by this section.

▼ **SECTION 212(c)(2):**

This section requires a public notice for all new or modified facilities which have on-site emission increases exceeding any of the daily maximums as specified in subdivision (g). There are no emission increases from any of the boilers as a result of this change. Therefore, public notice is not required by this section.

▼ **SECTION 212(c)(3):**

There are no emission increases from any of the boilers as a result of this change, public notice is not required by this section.

▼ **SECTION 212(g):**

This section requires a public notice for all new or modified sources which have on-site emission increases exceeding any of the daily maximums as specified in this subdivision. There are no emission increases from any of the boilers as a result of this change. Therefore, public notice is not required by this section.

▣ **RULES 401 & 402, VISIBLE EMISSIONS & NUISANCE**

The equipment is expected to comply with these rules. The above indicated complaint does not relate to these boilers, and the proposed change of condition should not have any affect on visible emissions or odors. There are no nuisance complaints against this company.

REGULATION XIII

▣ **RULE 1303(a), BEST AVAILABLE CONTROL TECHNOLOGY (BACT)**

This equipment is not subject to these requirements because there is no increase in emissions from this project.

▣ **RULE 1303(b)(1), MODELING**

No detailed modeling analysis required as there will not be any emission increases under this project.

▣ **RULE 1303 (b)(2), EMISSION OFFSETS**

Emission offsets are not required as there are no emission increases from this project.

▣ **RULE 1401, NEW SOURCE REVIEW OF CARCINOGENIC AIR CONTAMINANTS**

There are no emission increases from this project, hence Rule 1401 does not apply.

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REGULATION XXX

The proposed project is considered as a “minor permit revision” to the current Title V permit for this facility since there is not an emission increase of pollutants subject to Reg. XIII or hazardous air pollutants. Rule 3000(b)(12) defines a “minor permit revision” as any Title V permit revision that does not result in any of the following:

- Emission increase of RECLAIM pollutants over the facility starting Allocation plus nontradeable Allocations, or a higher Allocation amount which has previously undergone a significant permit revision process,
- Emission increase in hazardous air pollutants (HAPs) or pollutants subject to Reg. XIII, or
- Installation of a new permit unit or the modification or reconstruction of an existing permit unit subject to a New Source Performance Standard (NSPS) per 40 CFR Part 60 or a National Emission Standard for HAPs per 40 CFR Part 61 or Part 63.

Rule 3003(j) specifies that all proposed Title V permit revisions shall be submitted to EPA for review. This is the first permit revision requested by the facility since the Title V Renewal permit was issued on January 20, 2008. This revision includes the change to Condition D29-2 to reflect the most recent change in Rule 1146 for these three boilers. The cumulative emission increases resulting from this proposed permit revision are summarized as follows:

Revision	HAP	VOC	NOx	PM ₁₀	SOx	CO
1st permit revision, change of Condition D29-2 for Devices #D549, D551 & D553 (3 boilers) A/Ns 491819-21	0	0	0	0	0	0
Cumulative Emission Increase Since the Issuance of the Title V Renewal Permit (1/20/08)	0	0	0	0	0	0
Maximum Daily Threshold	30	30	40	30	60	220

CONCLUSIONS/RECOMMENDATIONS

The proposed project is expected to comply with all applicable District Rules and Regulations. Since the proposed project is considered as a “minor permit revision”, it is exempt from the public participation requirements under Rule 3006 (b). A proposed permit incorporating this permit revision will be submitted to EPA for a 45-day review pursuant to Rule 3003(j). If EPA does not have any objections within the review period, a revised RECLAIM/Title V permit will be issued to this facility.